

Whistleblower Policy

Purpose of the Policy:

International Minerals Innovation Institute (IMII) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the IMII, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Responsibility:

The Whistleblower Policy is intended to enable employees and others to raise serious concerns internally so that IMII can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of IMII's code of ethics or suspected violations of law or regulations that govern IMII's operations.

No Retaliation:

It is contrary to the values of IMII for anyone to retaliate against any board member, officer, employee or volunteer who, in good faith, reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of IMII. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Implementation Procedure:

The reporting procedure is as follows:

- The normal protocol is for IMII employees to report to their immediate supervisor.
- If they do not wish to report to their immediate supervisor or if the employee is not satisfied with the supervisor's response, they can report to the Executive Director.
- If the issue involves the Executive Director, or if the employee is not satisfied with the Executive Director's response, employees can report to the GNHR Committee which will appoint a representative to deal with the matter.

The Executive Director is generally responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will record all complaints and their resolution and will report at least annually to the Finance & Audit Committee on any issues relating to accounting or alleged financial improprieties or to the Governance, Nominations and Human Resources Committee on any issues relating to governance and human resources.

In the event that any complaints involve the Executive Director, employees can report to the GNHR Committee which will appoint a representative to ensure that any such complaints are investigated, resolved and reported to the Finance & Audit Committee on any issues relating to accounting or alleged financial improprieties or to the Governance, Nominations and Human Resources Committee on any issues relating to governance and human resources.